

EXHIBIT E

Declaration of Philip P. Mann

Case No. 21-CV-0817-TSZ

1 ARBITRATION BEFORE JAMS

2
3 BUNGIE, INC.)

4 Claimant,)

5 v.)

6 AIMJUNKIES.COM; PHOENIX)
7 DIGITAL GROUP LLC; DAVID)
8 SCHAEFER; JORDAN GREEN;)
9 JEFFERY CONWAY; and JAMES MAY,)

Respondents.)

CERTIFIED COPY

No. 5160000075

CONFIDENTIAL

10
11
12 REMOTE VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION
13 OF
14 JAMES MAY
15

16 9:01 A.M.

17 October 25, 2022

18 (All participants appeared via videoconference.)
19
20
21
22
23

24 LAURA GJUKA, CCR #2057

25 JOB NO.: 928458

<p style="text-align: right;">Page 122</p> <p>1 software operates.</p> <p>2 Q. Do you know what security measures Bungie has in</p> <p>3 place to prevent cheating in Destiny 2?</p> <p>4 A. I do not.</p> <p>5 Q. Did you -- do you ever -- strike that.</p> <p>6 Did you ever know what security measures</p> <p>7 Bungie's had in place to prevent cheating in Destiny 2?</p> <p>8 A. No, I -- I've never known what Bungie has in</p> <p>9 place.</p> <p>10 Q. Did you ever know what security measures Bungie</p> <p>11 has in place to prevent infringement of its copyrights</p> <p>12 for Destiny 2?</p> <p>13 A. No, I -- I've never known what Bungie has in</p> <p>14 place for any of that.</p> <p>15 Q. And I believe you answered this, but do you know</p> <p>16 where the cheat software for Destiny 2 specific to</p> <p>17 AimJunkies was stored?</p> <p>18 A. I do not.</p> <p>19 Q. Do you know what the process is to purchase the</p> <p>20 Destiny 2 cheat software from AimJunkies?</p> <p>21 A. I do not, as I've never had to purchase anything</p> <p>22 through AimJunkies.</p> <p>23 Q. We had discussed the cheat launcher used by</p> <p>24 AimJunkies. Are you aware of their -- the launcher</p> <p>25 program they use to use the cheat software?</p>	<p style="text-align: right;">Page 123</p> <p>1 A. I just know of it, but I don't know any -- I</p> <p>2 don't know how it works or operates.</p> <p>3 Q. Do you know who created the launcher program?</p> <p>4 A. I'm not sure who created it, no.</p> <p>5 Q. Do you know how the launcher works?</p> <p>6 A. I don't know how it works. I just know how to</p> <p>7 select a cheat and then load a cheat. That's it.</p> <p>8 Q. Do you think you know how that launcher would</p> <p>9 operate?</p> <p>10 A. No, I do not.</p> <p>11 MR. MANN: Object to the form.</p> <p>12 Q. (BY MR. MARCELO) And you -- you've developed</p> <p>13 cheats, though, for other video games, right? We had</p> <p>14 talked about that, or at least [REDACTED]</p> <p>[REDACTED] [sic], right?</p> <p>16 A. Yeah, correct.</p> <p>17 Q. Have any other cheats come to mind that you have</p> <p>18 developed and distributed through AimJunkies?</p> <p>19 A. Sorry, I really wasn't thinking over that over</p> <p>20 the break, to be honest. I should have, but I wasn't</p> <p>21 thinking about it. So as of now, I can't think of what</p> <p>22 else comes to mind right now.</p> <p>23 Q. Okay. I want to walk through your development</p> <p>24 of one of those cheats. Do you have a -- do you</p> <p>25 remember the development of any particular cheat best?</p>
<p style="text-align: right;">Page 124</p> <p>1 A. I mean, they're all different, so I couldn't</p> <p>2 really say. It's all dependent on game engine and</p> <p>3 everything else.</p> <p>4 Q. Sure. Let's walk through your development of</p> <p>5 the cheat for [REDACTED] okay?</p> <p>6 A. Okay.</p> <p>7 Q. When you start to develop a cheat, walk me</p> <p>8 through that process.</p> <p>9 A. Basically you try to -- to figure out what</p> <p>10 player -- where the player position is, where player</p> <p>11 structures are, try to figure out the --</p> <p>12 COURT REPORTER: Sorry, you try to</p> <p>13 figure out the what?</p> <p>14 A. Sorry, which part? Once you figure out the</p> <p>15 player --</p> <p>16 COURT REPORTER: Sorry.</p> <p>17 A. Once you figure out the player position and</p> <p>18 create a world-to-screen, you can draw that position of</p> <p>19 the enemy on the screen. That's basically where you</p> <p>20 start out as, just trying to get the basic thing set up.</p> <p>21 Q. And I think I missed one of the words, so player</p> <p>22 positioning and something screen.</p> <p>23 A. World-to-screen.</p> <p>24 Q. Can you spell that for me?</p> <p>25 A. It's w-o-r-l-d, t-o, s-c-r-e-e-n,</p>	<p style="text-align: right;">Page 125</p> <p>1 world-to-screen.</p> <p>2 Q. World-to-screen.</p> <p>3 A. Yeah.</p> <p>4 Q. And what is world-to-screen?</p> <p>5 A. It -- it grabs the player's camera position and</p> <p>6 turns the player's position into a world -- or the</p> <p>7 screen position.</p> <p>8 Q. Okay. And how do you find those portions of the</p> <p>9 code within the video game?</p> <p>10 A. You just try to figure out what accesses the --</p> <p>11 the -- or where the view matrix is and everything and</p> <p>12 calculate the view matrix.</p> <p>13 Q. Do you use any reverse engineering tools like</p> <p>14 the ReClass tool to do this?</p> <p>15 A. Yes.</p> <p>16 Q. And for [REDACTED] did you use the ReClass tool</p> <p>17 to do this?</p> <p>18 A. Yes.</p> <p>19 Q. Did you use your modified ReClass tool to do</p> <p>20 this?</p> <p>21 A. No.</p> <p>22 Q. Okay. Okay. So you've used ReClass tool and</p> <p>23 you've figured out the code for player position and</p> <p>24 world-to-screen. What's the next step in developing the</p> <p>25 cheat?</p>

<p>Page 126</p> <p>1 A. You can -- there's multiple things you can do. 2 It just depends on the game and what the game needs 3 really. So with [REDACTED] you want to find -- well, 4 basically all you need after that's the aimbot 5 coordinates -- or not -- sorry, the screen coordinates 6 to calculate the aimbot to the player position. 7 Q. And that's what you did to create the aimbot 8 feature for [REDACTED] The [REDACTED] cheat? 9 A. Yes. 10 Q. What were the other features of your [REDACTED] 11 cheat? 12 A. Like I said before, speed hack. 13 Q. How did you develop the speed hack feature? 14 A. Just found where the -- the speed setting, the 15 mult- -- speed multiplier was and -- and set it to, 16 like, 2 or 3 instead of 1. 17 Q. And, again, to find where the speed setting is, 18 is that -- are you using the ReClass tool to figure out 19 where that data is? 20 A. In this case, no. 21 Q. How did you find the speed hack? 22 A. In this case there's a directory that they have 23 in their game that you can modify all their -- or change 24 certain things in their game, and speed was one of them. 25 Q. And for the aimbot feature, did you use the</p>	<p>Page 127</p> <p>1 ReClass tool to determine where the various data 2 structures that needed to be affected were? 3 A. No, not for the aimbot. 4 Q. How did you find the data structures for the 5 aimbot? 6 A. Well, I already had it from the entity list, the 7 position for it, so I just grabbed it from there. I 8 didn't have to reuse ReClass again to do that. 9 Q. You had used ReClass at the beginning to figure 10 out where the various data structures were? 11 A. To find out the data, yes. 12 Q. Were there any other features of The [REDACTED] 13 cheat? 14 A. I can't remember offhand. This was back in 15 2016, I think. 16 Q. Was one position kill a feature of The [REDACTED] 17 cheat? 18 A. I do not recall if it was or not. 19 Q. Let's walk through the [REDACTED] cheat -- 20 developing the [REDACTED] cheat. 21 A. Okay. 22 Q. How did -- how did you begin to develop that 23 cheat? 24 A. Same process. 25 Q. And so do you have to first download the game</p>
<p>Page 128</p> <p>1 that you're creating the cheat for? 2 A. Yeah. 3 Q. And so you download [REDACTED] and then how -- 4 what's your next step in developing the cheat? 5 A. Just try to -- well, since the game engine is 6 known and there were lots of public files and stuff on 7 it, it was -- it was easy for [REDACTED] I mean, they 8 basically show you where everything is, so it wasn't 9 very complicated. 10 Q. I appreciate that. But what was the next step 11 once you had downloaded the game to the -- 12 A. Oh, I'm sorry. The next step, like I said, you 13 just -- you got to find the player coordinates, the 14 world-to-screen, and in some cases, if you want to -- 15 like, a bone name bot or something, you've got to find 16 the bone structures in the class that have the bone 17 coordinates. 18 Q. And, again, are you doing this using a reverse 19 engineering tool? 20 A. It was mostly all done through ReClass. 21 Q. Once you have a cheat -- well, let me step back. 22 After you have found those sections of the 23 code, the player positioning, the world-to-screen, the 24 other sections of code you need, are there any more 25 steps in developing the cheat?</p>	<p>Page 129</p> <p>1 A. I mean, it depends on what features and stuff 2 you plan on adding. I mean, it's all basically the same 3 thing for any cheat, really. 4 Q. And so once the cheat has been fully developed, 5 how do you get the cheat -- let me step back. 6 Do you give the cheat, then, to AimJunkies? 7 A. I do. 8 Q. And how do you get the cheat to AimJunkies? 9 A. I give it to David Schaefer, and then they take 10 care of it from then -- from there. 11 Q. How do you transfer the cheat to Mr. Schaefer? 12 A. Over the -- the -- what's it called? -- the 13 upload system on there. 14 Q. The upload system where? 15 A. They just have a place to upload a cheat, and 16 that's it. I don't -- I don't know what happens after 17 that. 18 Q. When you say "they," are you referring to 19 AimJunkies.com? 20 A. I'm just saying -- so Dave -- Dave Schaefer, he 21 takes care of that. I just upload it, and then he takes 22 care of it from there. 23 Q. But where do you upload the cheat? 24 A. I just upload it right to their site. 25 Q. The site being AimJunkies.com?</p>